

**Hearing Date: June 30, 2009 (Adjourned)**

FRASER TREBILCOCK DAVIS & DUNLAP, PC  
G. ALAN WALLACE (P-69333)  
Fraser Trebilcock Davis & Dunlap, P.C.  
124 W. Allegan Street, Suite 1000  
Lansing, MI 48933  
Telephone: 517.482.5800  
Fax: 517.482.0887  
Email: awallace@fraserlawfirm.com

**ATTORNEYS FOR THE CITY OF LANSING, MICHIGAN**

124 W. ALLEGAN STREET, SUITE 1000  
LANSING, MI 48933  
TELEPHONE 517.482.5800  
FACSIMILE 517.482.0887  
EMAIL GWALLACE@FRASERLAWFIRM.COM

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

**GENERAL MOTORS CORPORATION, *et al.*,**  
  
Debtors

Chapter 11  
Case No. 09-50026 (REG)  
Jointly Administered

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**THE CITY OF LANSING'S SECOND LIMITED WITHDRAWAL OF ITS ORIGINAL  
AND SUPPLEMENTAL OBJECTIONS TO THE DEBTOR'S IDENTIFICATION OF  
CERTAIN EXECUTORY CONTRACTS DESIGNATED  
FOR ASSUMPTION AND ASSIGNMENT**

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The City of Lansing, Michigan, by its attorneys, Fraser Trebilcock Davis & Dunlap, P.C.,  
and for the Second Limited Withdrawal of its Original and Supplemental Objections to the  
Debtor's Identification of Certain Executory Contracts Designated for Assumption and  
Assignment, states as follows:

1. On June 2, 2009, this Court entered the “Order Pursuant to 11 U.S.C. §§105, 363, and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006: (i) Approving Procedures For Sale Of Debtor’s Assets Pursuant To Master Sale And Purchase Agreement With Vehicle Acquisition Holdings, LLC, a U.S. Treasury Sponsored Purchaser; (ii) Scheduling Bid Deadline and Sale Hearing Date; (iii) Establishing Assumption and Assignment Procedures; and (iv) Fixing Notice Procedures and Approving Form Of Notice” (hereinafter referred to as the “Order”). [Docket No. 274.]

2. On June 15, 2009, the City of Lansing filed its original Objection to the Order, alleging, *inter alia*, that Debtor failed to adequately describe the executory contracts that were designated for possible assumption and assignment in the notices received by the City of Lansing. At the time of filing the Objection, the City of Lansing had received sixteen (16) assumption and assignment notices from the Debtor.

3. On June 19, 2009, the City of Lansing filed its Supplemental Objection to include four (4) additional assumption and assignment notices received by the City of Lansing on June 17, 2009, which also failed to adequately describe the executory contracts designated for possible assumption and assignment.

4. As of June 30, 2009, the contract description on the Contract Website for the following executory contracts (Contract Vendor Master ID Nos.) were amended and now adequately identify the executory contracts that have been designated for possible assumption and assignment:

- **5716-00305657**
- **5716-00305654**
- **5716-00305659**
- **5716-00305655**
- **5716-00305656**
- **5716-00305659**
- **5716-00305653**

5. Accordingly, to the extent the City of Lansing's Objection or Supplemental Objection relate to the above executory contracts, the City of Lansing withdraws its Objection and Supplemental Objection.

6. In addition, on June 23, 2009, the City of Lansing received two (2) additional assumption and assignment notices from the Debtor referencing two (2) separate executory contracts (Contract Vendor Master ID: **5716-01058404** and **5716-01058406**).

6. Since no other objection was filed regarding executory contract **5716-01058406**, the status of executory contract **5716-01058406** on the Contract Website should be changed from "Objected" to "Noticed".

8. The City of Lansing affirms its Objection and Supplemental Objection regarding the remaining twenty (14) assumption and assignment notices received from the Debtor until an adequate description of each executory contract is provided.

WHEREFORE, the City of Lansing withdraws its Objection and Supplemental Objection in regards to executory contracts listed in paragraph four (4) above and as to contracts **5716-01058404** and **5716-01058406**.

Dated: June 30, 2009

Fraser Trebilcock Davis & Dunlap, P.C.  
Attorneys for the City of Lansing

/s/ G. Alan Wallace

G. Alan Wallace (P-69333)  
Fraser Trebilcock Davis & Dunlap, P.C.  
124 W. Allegan Street, Suite 1000  
Lansing, MI 48933  
Telephone: 517.482.5800  
Fax: 517.482.0887  
Email: awallace@fraserlawfirm.com